

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

**PLAINTIFF'S ALTERNATIVE MOTION FOR LEAVE TO USE
DISCOVERY OR, IN THE FURTHER ALTERNATIVE,
TO CONDUCT JURISDICTIONAL DISCOVERY**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL") respectfully moves this Court for an order permitting LPL to use the jurisdictional discovery obtained in the matter of *Commissariat à l'Energie Atomique v. Samsung Electronics Co., et al.*, Case No. 03-484-MPT (the "CEA Litigation") in order to further establish this Court's jurisdiction over Defendant Chi Mei Optoelectronics ("CMO"). On April 6, 2007, CMO filed a Motion to Dismiss for Lack of Personal Jurisdiction and Insufficiency of Service of Process (D.I. 19). Although LPL believes that it has sufficiently demonstrated that CMO's motion to dismiss should be denied, LPL requests, in the alternative, that it be permitted to use the jurisdictional discovery produced in the CEA Litigation, to which CMO was a party, to further establish CMO's jurisdictional contacts. In the further alternative, LPL requests that it be permitted to take jurisdictional discovery because it has sufficiently demonstrated that its claims against CMO are meritorious and that jurisdiction does exist against CMO. Jurisdictional discovery will further establish that this Court may exercise jurisdiction over CMO.

LPL therefore requests that it be allowed to use the documents produced in the CEA Litigation, and that CMO be ordered to supplement its April 2005 production or, in the further alternative, that LPL be allowed to conduct jurisdictional discovery from CMO and obtain discovery from third-parties that have information relevant to personal jurisdiction over CMO in order to supplement the evidence supporting this Court's personal jurisdiction over CMO.

The factual and legal support for this motion are set forth in the accompanying brief, the Declaration of Ashley B. Stitzer and the exhibits attached thereto, which have been simultaneously filed and served with this motion.

June 18, 2007

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